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Attorneys for Complainant

**BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SALLY LEE STEVENS
44 185 Dalea Circle
La Quinta, CA 92253

Physical Therapist License No. PT 5633

Respondent.

Case No. 1D 2002 63249

OAH No. L2005120452

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the parties in this proceeding that the following matters are true:

PARTIES

1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical Therapy Board of California. He brought this action solely in his official capacity and is represented in this matter by Bill Lockyer, Attorney General of the State of California, by E. A. Jones III, Deputy Attorney General.

2. Sally Lee Stevens (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about January 14, 1971, the Physical Therapy Board of California issued Physical Therapist License No. PT 5633 to Sally Lee Stevens. The License was in full force and effect at all times relevant to the charges brought in Accusation No. 1D 2002 63249 and expired on September 30, 2005.

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4. Accusation No. 1D 2002 63249 was filed before the Physical Therapy Board of California (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on May 20, 2005. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 1D 2002 63249 is attached as exhibit A and incorporated herein by reference.

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5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 1D 2002 63249. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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8. Respondent understands that the charges and allegations in Accusation No. 1D 2002 63249, if proven at a hearing, constitute cause for imposing discipline upon her Physical Therapist License.

9. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation and that those charges constitute cause for discipline. Respondent hereby gives up her right to contest that cause for discipline exists

based on those charges.

10. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Physical Therapist License without further process.

RESERVATION

11. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Physical Therapy Board of California or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

CONTINGENCY

12. This stipulation shall be subject to approval by the Physical Therapy Board of California. Respondent understands and agrees that counsel for Complainant and the staff of the Physical Therapy Board of California may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

13. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the (Board) may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Physical Therapist License No. PT 5633, issued

1 to Respondent Sally Lee Stevens is surrendered and accepted by the Physical Therapy Board of
2 California.

3 15. The surrender of Respondent's Physical Therapist License and the
4 acceptance of the surrendered license by the Board shall constitute the imposition of discipline
5 against Respondent. This stipulation constitutes a record of the discipline and shall become a
6 part of Respondent's license history with the Board.

7 16. Respondent shall lose all rights and privileges as a physical therapist in
8 California as of the effective date of the Board's Decision and Order.

9 17. Respondent shall cause to be delivered to the Board both her certificate
10 and pocket license on or before the effective date of the Decision and Order.

11 18. Respondent fully understands and agrees that if she ever files an
12 application for licensure or a petition for reinstatement in the State of California, the Board shall
13 treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations
14 and procedures for reinstatement of a revoked license in effect at the time the petition is filed,
15 and all of the charges and allegations contained in Accusation No. 1D 2002 63249 shall be
16 deemed to be true, correct, and admitted by Respondent when the Board determines whether to
17 grant or deny the petition.

18 19. Respondent shall pay the Board its costs of investigation and enforcement
19 in the amount of \$9,536.00 prior to issuance of a new or reinstated license.

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26 ACCEPTANCE

27 I have carefully read the Stipulated Surrender of License and Order. I understand
28 the stipulation and the effect it will have on my Physical Therapist License. I enter into this

1 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to
2 be bound by the Decision and Order of the Physical Therapy Board of California.

3 DATED: April 14, 2006.

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5 Original Signed By: _____
6 SALLY LEE STEVENS
7 Respondent

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9 ENDORSEMENT

10 The foregoing Stipulated Surrender of License and Order is hereby respectfully
11 submitted for consideration by the Physical Therapy Board of California of the Department of
12 Consumer Affairs.

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14 DATED: April 14, 2006.

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16 BILL LOCKYER, Attorney General
17 of the State of California

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19 Original Signed By: _____
20 E. A. JONES III
21 Deputy Attorney General
22 Attorneys for Complainant

23 Stevens Stipulated Decision.wpd
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Exhibit A
Accusation No. 1D 2002 63249

**BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
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STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SALLY LEE STEVENS
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Physical Therapist License No. PT 5633

Respondent.

Case No. 1D 2002 63249

OAH No. L2005120452

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Physical Therapy Board of California, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on June 12, 2006.

It is so ORDERED May 11, 2006.

Original Signed By:

FOR THE PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
Donald A Chu, PhD, PT, President